

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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GENERAL MOTORS CORPORATION,

CIVIL ACTION NO. 02-74587

*Plaintiff,*

vs.

HONORABLE NANCY G. EDMUNDS  
Honorable Magistrate Judge Steven C. Pepe

KEYSTONE AUTOMOTIVE INDUSTRIES, INC.,  
and TONG YANG INDUSTRY CO., LTD.,

*Defendants.*

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**STIPULATED ORDER**

WHEREAS, General Motors seeks modification of the Stipulated Protective Order, dated February 23, 2004, to add Timothy G. Gorbatoff to the designated in-house counsel for General Motors qualified to view “CONFIDENTIAL-ATTORNEYS EYES ONLY” testimony, information, documents and things.

WHEREAS, the defendants Keystone and Tong Yang have not lodged any objection to GM’s modification and consent in its modification.

IT IS HEREBY ORDERED that paragraph 5.c. of the Stipulated Protective Order is amended to read as follows (with bolded language added):

c. Documents, depositions or information designated as “CONFIDENTIAL-ATTORNEYS EYES ONLY” shall be disclosed only to counsel of record for the parties, those attorneys, paralegals and support staff who are employed in the preparation and trial of this action (including retained counsel of record, and, for General Motors, its in-house counsel, Charles Ellerbrock **and** **Timothy G. Gorbatoff**), and any outside expert requested by a party or parties’ attorney to furnish expert technical or other expert services in preparation for the trial of this action, such independent expert first complying with paragraph 6 and disclosure subject to paragraph 6A. Otherwise, documents and other information

designated as "CONFIDENTIAL – ATTORNEYS EYES ONLY" shall be treated the same as documents and information designated as "CONFIDENTIAL".

Dated: December 6, 2006  
Ann Arbor, Michigan

s/Steven D. Pepe  
United States Magistrate Judge

STIPULATED AND AGREED:

/s/ Marc Lorelli  
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